

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TATIANA WESTBROOK, an individual;
JAMES WESTBROOK, an individual; HALO
BEAUTY PARTNERS, LLC, a Nevada Limited
Liability Company,

Plaintiffs,

v.

KATIE JOY PAULSON, an individual;
WITHOUT A CRYSTAL BALL, LLC, a
Minnesota Limited Liability Company; and
DOES 1 through 100, inclusive,

Defendants.

NO. 2:20-cv-01606-BJR

**DECLARATION OF MICHAEL J.
SALTZ IN RESPONSE TO REQUEST
FOR STATUS CONFERENCE**

**DECLARATION OF MICHAEL J.
SALTZ -1**
(2:20-CV-01606-BJR)

CARROLL, BIDDLE, & BILANKO, PLLC
1000 2nd Avenue, Suite 3100
Seattle, WA 98104

1 I, MICHAEL J. SALTZ, hereby state as follows:

2 1. I am an attorney admitted *pro hac vice* to appear before the U.S. District Court for
3 the Western District of Washington in the above-captioned matter, and am a partner of Jacobson,
4 Russell, Saltz, Nassim & de la Torre, LLP, counsel for Plaintiffs Tatiana Westbrook, James
5 Westbrook, and Halo Beauty Partners, LLC in this matter. I am over the age of eighteen and am
6 competent to testify to the facts stated herein.

7 2. I am familiar with Washington RPC 3.6. I have a personal Twitter account that I
8 have used to investigate the facts of this case and to obtain public assistance in the collection of
9 evidence and information. To be certain, because a significant portion of the statements at issue
10 in this case were published to a specific and specialized audience on Twitter, I have gone on to
11 Twitter to both collect evidence of said statements and identify potential witnesses and other
12 information to help prove the elements of our claims or to better understand the evidence that is
13 being provided to us by hundreds of informants and potential witnesses.

14 3. To the extent that I have commented on this case on my Twitter account, it has
15 been within the ambit of the rule. Some tweets have been to specifically respond to Ms.
16 Paulson's numerous unprovoked prejudicial statements. For example, shortly after the
17 Complaint was filed, I was informed that Ms. Paulson made an unprovoked prejudicial statement
18 about this case on her YouTube channel that was directly contradictory to a previous statement
19 she made. In response, I tweeted:



23 Ms. Paulson blocked my Twitter account shortly after my clients filed their lawsuit.

24 4. Otherwise, my tweets that are related to the case have been limited to the
25 investigation of this matter in progress, and requests for assistance in obtaining evidence and
26 information necessary to this matter. For example,

**DECLARATION OF MICHAEL J.
SALTZ -3**
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5. None of my public statements will have a substantial likelihood of materially prejudicing this case. It is my belief that Defendants are, through these proceedings, attempting to inhibit our ability to perform our investigation of this matter and seek the public's assistance

DECLARATION OF MICHAEL J. SALTZ -4
(2:20-CV-01606-BJR)

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1 in obtaining evidence and information on Twitter because the amount of information and
2 assistance that we have been able to obtain thus far through Twitter has been both extensive and
3 extremely beneficial to Plaintiffs obtaining information and witnesses that would have been near
4 impossible to find through other means.

5 6. Currently, Ms. Paulson has 8,430 followers on Twitter and approximately
6 135,000 subscribers on YouTube.

7 7. In or about the beginning of November 2020, after the filing of this lawsuit, I was
8 monitoring Twitter and YouTube for information regarding Defendants' activities on social
9 media. In doing so, I observed that a number of people on Twitter, and a number of YouTube
10 creators, all of whom have published negative criticisms about Defendants, were publicizing that
11 their social media accounts were being attacked by hackers.

12 8. On or about November 19, 2020, while attending a mediation in Los Angeles,
13 California, I noticed on my mobile phone that there had been an unauthorized attempt to access
14 my Instagram account. Although I have had an Instagram account for a number of years, no one
15 had ever previously, to my knowledge, tried to hack into my Instagram account. As such, I found
16 the timing of the attempted hack into my Instagram account to be too much of a coincidence, in
17 that the first time a person attempted to hack into my account was around the same time that Ms.
18 Paulson's detractors' social media accounts were also purportedly under attack by hackers.

19 9. On or about January 7, 2021, I was alerted to a particular series of tweets from a
20 Twitter account that I recognize as belonging to Ms. Paulson. I learned that said Tweet was part
21 of a series of postings Ms. Paulson was purportedly posting containing public statements about
22 this lawsuit, and containing particular threats and insults directed at myself and Plaintiffs'
23 witnesses. Given the benefit of reviewing said tweets after recent events, it is my observation
24 that one of these tweets appears to contain a possible admission by Ms. Paulson that she is the
25 benefactor of my law firm's email account potentially being hacked. The tweet in questions
26

states: “Email communications go both ways – trust me. Just like I’m being watched – so are you. We know everything.” Below is a true and correct copy of a screenshot of said tweet:



Katie Joy
@woacbofficial

...

**Email communications go both ways
- trust me. Just like I’m being
watched - so are you. We know
everything.**

10. On or about January 7, 2021, I personally viewed a video livestream of Ms. Paulson on Defendants’ Katie Joy Live YouTube Channel titled “The worst day ever.” In watching said video, I observed Ms. Paulson tell her subscribers to go after her detractors to defend Ms. Paulson, and to let Ms. Paulson know who the detractors are so she can “put them on blast. They’re not going to mess with you – we’ll take care of it.”¹ I have obtained a download of said video from Defendants’ YouTube channel without the live chat (live chat is not subject to download from YouTube as part of the video) and have placed it into a Dropbox for the Court to view at its convenience at this link:

<https://www.dropbox.com/s/nxzflpn7akqtqqj/2021.01.07%20The%20worst%20day%20ever%20%28KJ%20Live%29.mp4?dl=0> .

11. Specifically, in this video, I personally observed Ms. Paulson make the following statement starting at time stamp 1:08:56:

The vintage Katie is back. I am not placating. I'm not gonna pretend to be less me. I'm not gonna listen to my YouTube manager and be like: “you should do things that don't upset your audience.” Dude, everything I do upsets my audience. Like, no. “Well are there topics that you can avoid?”

¹ “Put on blast” means to tell someone's information to others without their consent. This includes doxing. See <http://onlineslangdictionary.com/meaning-definition-of/put-on-blast> . It also means to publicly attack, scold, shame, or mock one, typically on social media. See <https://idioms.thefreedictionary.com/put+on+blast> .

1 Anyways, don't feel bad about defending me. **Defend me! Go for it! Have fun!**
2 Like, don't feel like just because you defend me that they can make an example
3 out of you, **because we'll make an example out of them!**

4 We will! We'll prove to everyone what they're doing to you guys.

5 Don't be quiet. Don't be shy. Speak your truth.

6 I always used to say, like: "Don't feel like you have to defend me." But now I'm
7 saying like, if you're seeing this bullshit, and you feel compelled, you can defend
8 me. You can!

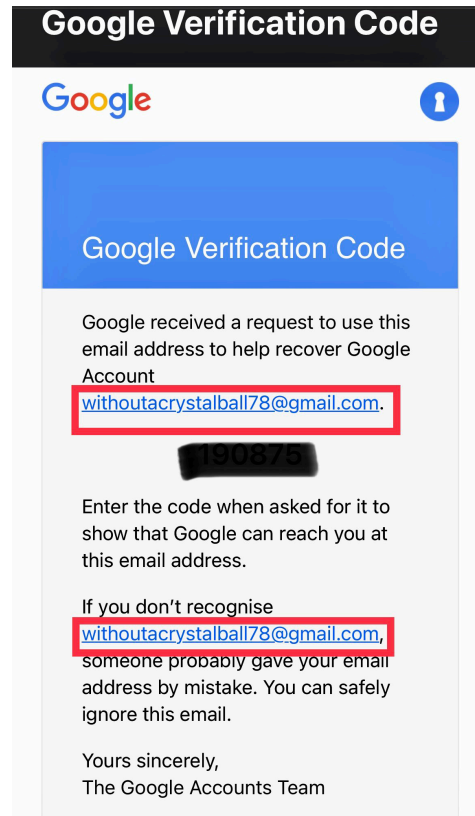
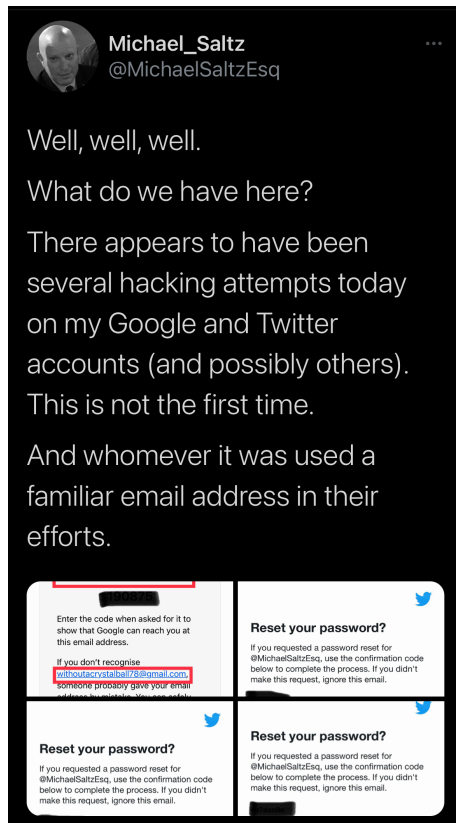
9 You can speak out against bullying. You can!

10 You can tell the trolls to "go away!" You can tell them they're not welcome. The
11 reason why they are so, um, invested here, is because they feel like they can, and
12 that you guys aren't going to respond because I've told you not to. And they've
13 manipulated that. And they have pounced on that.

14 So I just say: **I have your back.** You're not going to get harassed. **And if you do,**
15 **you just send me a dm and you tell me, and I'll put them on blast!** They're not
16 going to mess with you. **We'll take care of it.**

17 12. On or about January 16, 2021, a massive and relentless harassment and hacking
18 campaign was unleashed against Ms. Paulson's purported private detractors, YouTube Creators
19 that have been critical of Ms. Paulson, persons who have been publicly identified as witnesses
20 and informants against Defendants, and Plaintiffs' counsel. A small portion of the extent of said
21 harassment and hacking campaign is memorialized in the concurrently filed declaration of
22 Natalie Kennett, which memorializes the harassment, intimidation and death threats she has been
23 receiving for being a witness for Plaintiffs' in this case, as well as the intimidation, death threats
24 and harassment other perceived detractors of Ms. Paulson have received publicly on Twitter.

25 13. On January 16, 2021, there were hacking attempts made on my Google and
26 Twitter accounts. Below is a true and correct copy of my tweet memorializing the hacking
attempt, which I posted in an attempt to ward off other hacking attempts:



14. As shown in the Google Verification Code notice above, it states that my email address was being added as a recovery email address for Ms. Paulson's email account. This means that, had the Google notice been legitimate, I would have been able to click on a link and sign into Ms. Paulson's email account and archive all of her emails. However, because illegally hacking into a party's emails is something I would never do, I investigated the notice and determined that the Google notice was a fake phishing notice. I determined that had I clicked on any of the links, my email account credentials would have been hacked. My tweet above did not directly accuse Ms. Paulson of being the source of this hacking attempt.

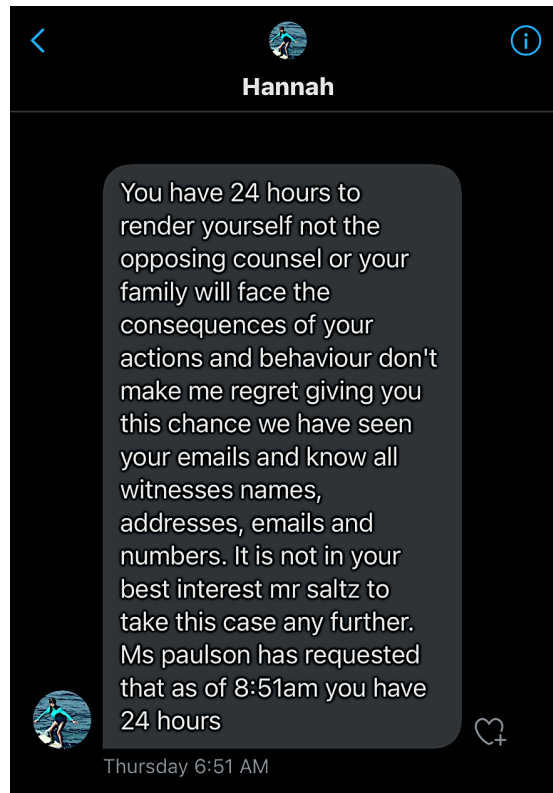
15. Starting on January 16, 2021, I personally observed and documented the harassment and threats that were being made against Ms. Paulson's perceived detractors, including the death threats being made against me and my family and other YouTube creators, and I can attest to what happened on Twitter and elsewhere after Ms. Paulson's aforementioned

statement is far more extensive and disturbing than that of which has been portrayed in Ms. Kennett's declaration.

16. By way of example, and not limitation, in addition to the multitude of death threats against me that I have received multiple times a day since January 16, 2021 to the present, and in addition to the threats from the hackers to plant evidence in my email account as part of a plan to frame me as a pedophile (see screenshots attached to the Declaration of Natalie Kennett disclosing this plan), the hackers have sent me very disturbing messages threatening to kill my witnesses and my children if I do not stop pursuing this case against Ms. Paulson. In one such instance, on or about January 21, 2021, the purported hackers created a Twitter account under the name "@Hannah233303" using an image of my youngest daughter as the profile picture. The purported hackers then sent me a public message intimating that harm will come to my children if I do not leave Ms. Paulson alone. Below is a true and correct copy of a Twitter screenshot I obtained of said posting:

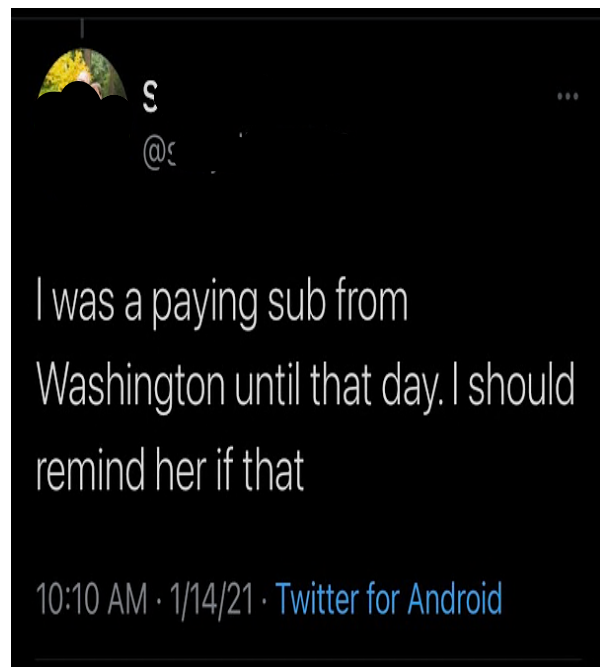


1 17. Shortly after said tweet was sent threatening harm to my children, I received a
 2 private direct message on my Twitter account from the aforementioned Hannah account that said
 3 my family will face the consequences if I remain on the case. Below is a true and correct copy of
 4 a Twitter screenshot I obtained of said message:



18 18. From January 16, 2021 through to the filing of this declaration, I have received
 19 information from multiple YouTube channel creators that publish commentary videos on
 20 YouTube. Specifically, I have been informed that a significant number of YouTube channel
 21 creators that have published videos critical of Ms. Paulson have, since January 16, 2021 to the
 22 present: (1) had their social media accounts hacked; (2) have been the recipients of a significant
 23 number of hacking attempts into their social media; (3) have received harassing emails; (4) have
 24 received death threats; and/or (5) have had their non-offensive content mass flagged on YouTube
 25 and/or Instagram.

19. I have also observed that the purported hackers have even gone after and harassed Defendants' former paid members from Washington. Specifically, on or about January 12, 2021, I witnessed a person that I will identify as Ms. S for her own protection, participate in a live chat during a live stream video as a paid member of Defendants' Katie Joy Live YouTube Channel. During the video, Ms. Paulson asked if anyone ever had to take their child to a trauma center. Ms. S answered that she had. This caused individuals in the chat to ask Ms. S if her child got better. Ms. S responded that her daughter died at the age of 10 from cancer. Ms. Paulson saw that the live chat's attention had shifted from her to Ms. S with people giving Ms. S their condolences. Ms. Paulson thereafter became visibly angry and called out Ms. S for taking the attention of the viewers away from Ms. Paulson telling her story. Thereafter, Ms. S published on Twitter certain posts about the experience and that, as a Washington resident, canceled her paid memberships to Defendants' YouTube channels. Below are true and correct Twitter screenshots I obtained of Ms. S's tweets saying she canceled her paid memberships that had been providing Ms. Paulson income from the state of Washington:



20. On or about January 16, 2021, I observed the purported hackers target, harass and bully Ms. S by sub-tweeting under Ms. S's tribute to her daughter's memory that Ms. S should "get over it." Below are true and correct Twitter screenshots I obtained of said harassing tweets.



21. As a direct result of such public displays of targeted harassment, threats and hacking of Ms. Paulson's detractors and critics, I received multiple messages from witnesses that have previously agreed to cooperate and/or testify in these proceedings stating that they are now too scared to do so because they do not want to be targeted by the hackers.

22. On January 18, 2021, I began to receive direct messages from at least one of the purported hackers who disclosed that Ms. Paulson directed her to harass and hack my accounts, as well as our witnesses' accounts. Below is a true and correct copy of some of those messages:





23. Out of concern for the safety and well-being of our witnesses, at 8:21 a.m. PST on January 18, 2020, I emailed Mr. Brown to advise him of the intimidation of our witnesses and massive hacking of the accounts of individuals related to this case. I requested a telephone call with Mr. Brown to discuss this situation. Mr. Brown never responded to my request for a call. A copy of my first email is attached as Exhibit A to Mr. Brown's Declaration (Dkt. 41).

24. I exchanged several emails with Mr. Brown on January 18, 2021. Attached as **Exhibit 1** is a true and correct copy of all of the emails exchanged between us on January 18, 2021.

25. No attempt was made by Mr. Brown to substantively discuss the matter prior to filing Defendants' Request for Status Conference. I received a notification at 5:53 p.m. PST that Defendants had filed the Request for Status Conference. Attached as **Exhibit 2** is a true and correct copy of the Notice of Electronic Filing dated January 18, 2021.

26. In response to the hacking attempts, incessant harassing emails, and threats to me and my family, I contacted the Federal Bureau of Investigation and the Los Angeles Police Department and informed them of said events. We are now working with the authorities to pursue investigations into this matter.

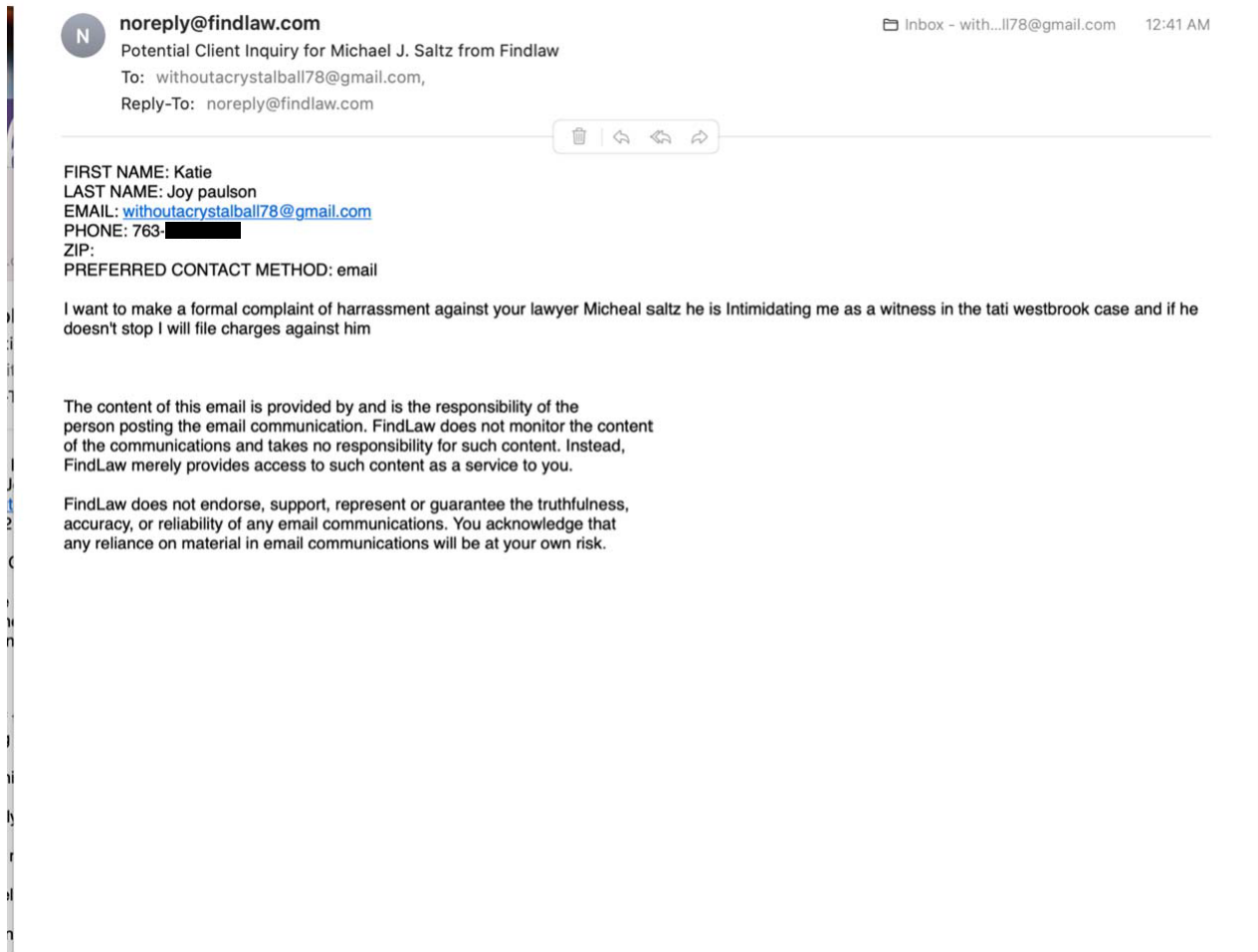
I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Michael J. Saltz
Michael J. Saltz

EXHIBIT “1”

From: Michael P. Brown <mbrown@gordontilden.com>
Sent: Monday, January 18, 2021 8:04 AM
To: Michael Saltz; Lani Levine; Jeffrey Bilanko; Suki Kaplan
Subject: Fake "Complaint"

Katie did not make this "complaint." The phone number is not hers.



Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101

From: Michael Saltz msaltz@jrsnd.com
Subject: 3171-005 RE: Fake "Complaint"
Date: January 18, 2021 at 8:20 AM
To: Michael P. Brown mbrown@gordontilden.com, Lani Levine lani@jrsnd.com, Jeffrey Bilanko jbilanko@cbblegal.com, Suki Kaplan skaplan@CBBLegal.com



JACOBSON, RUSSELL, SALTZ,
NASSIM & DE LA TORRE LLP

Michael:

There is a lot more than that going on. We should set a time to discuss.

Be advised that one of our witnesses is now suicidal due to the harassment she has received for refusing to not delete a comments about your clients' deletion of potentially relevant evidence, and your client published a tweet on January 7, 2021 that she has been reading our emails and knows everything.

We also have direct messages from your client threatening our witness with lawsuits if she shares her information with us, and there appears to be direct communication on Twitter with one of the harassers that made death threats and other threats against our witness.

We are in the process of providing all of this information to the federal authorities and will be pressing charges once we determine all who are involved in the hacking attempts and the witness tampering.

The witness who was harassed suffers from autism, amongst other ailments, and lacks the technological ability to have participated in any hacking attempt on your client, despite your clients' false public claims to the contrary. Furthermore, we have uncovered evidence showing that the witness' email account was archived and accessed by your clients' known and working email address. To the extent that she received said information, demand is hereby made that she immediately document its receipt and destroy the contents of said archive without reviewing them.

Please advise as to your earliest availability.

Yours truly,
Michael J. Saltz, Esq.
JACOBSON, RUSSELL, SALTZ, NASSIM & DE LA TORRE, LLP
1880 Century Park East
Suite 900
Los Angeles, California 90067
Tel: 310.446.9900 Ext. 201
Fax: 310.446-9909
msaltz@jrsnd.com
www.jrsnd.com

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Michael Saltz

RE: Fake "Complaint"

To: Michael P. Brown, Lani Levine, Jeffrey Bilanko, Suki Kaplan

Inbox - Exchange January 18, 2021 at 9:13 AM



JACOBSON, RUSSELL, SALTZ,
NASSIM & DE LA TORRE LLP

Michael:

You should be made aware that the hacker has just stated on Twitter that he/she was hired by your clients to do what they did.

You should check the account before it is deleted.

Suffice it to say, very serious claims have now been made implicating your client in these and other matters. We ask that you take all steps to preserve any and all evidence so that a full forensic investigation.

We also demand that you document and take control over the 24 twitter accounts and three email accounts that apparently belong to your client to safe guard them from deletion due to her "sock" accounts now being exposed. Please confirm that you have done so that such evidence can be preserved pursuant to the Court's order.

We await your response.

Yours truly,
Michael J. Saltz, Esq.
JACOBSON, RUSSELL, SALTZ, NASSIM & DE LA TORRE, LLP
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From: Michael Saltz
Sent: Monday, January 18, 2021 9:45 AM
To: Michael P. Brown; Lani Levine; Jeffrey Bilanko; Suki Kaplan
Subject: 3171-005 RE: Fake "Complaint"



**JACOBSON, RUSSELL, SALTZ,
NASSIM & DE LA TORRE LLP**

Mr. Brown:

The other hacker is disclosing information of your clients' plans to delete evidence and bring false charges against me.

They claim that your clients gave them a special IP address and passwords to do their work on their behalf. Part of that was to sign myself up with various porn sites and then make police reports against me claiming I am a pedophile. The hackers claim to be 13 and 15 years old and were hired by your clients through Facebook. They claim that this was done to discredit me so that I could not prosecute the case.

They also claim that your client was fabricating evidence to make a claim that we were harassing her.

They also claim that they were told to try and hack into your clients' accounts to make it look like she was being hacked too so she could pretend to be a victim.

There is evidence of open communications and planning between your clients and the hackers' accounts, as all involved foreshadowed that they were going to hit us with a big surprise.

We demand to know what your involvement or knowledge was of these alleged plans.

Be advised that we are immediately sending a subpoena to Twitter to obtain the full identity of these now admitted hackers that your client purportedly hired. I assume, under the circumstances, you will not be objecting.

Be advised that the hackers claim to have documented all interactions with your clients.

Yours truly,

Michael J. Saltz, Esq.
JACOBSON, RUSSELL, SALTZ, NASSIM & DE LA TORRE, LLP
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Los Angeles, California 90067
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www.jrsnd.com

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From: Michael P. Brown <mbrown@gordontilden.com>
Sent: Monday, January 18, 2021 10:01 AM
To: Michael Saltz; Lani Levine; Jeffrey Bilanko; Suki Kaplan
Subject: RE: 3171-005 RE: Fake "Complaint"

We need to get the court involved ASAP. Katie denies your allegations, and I certainly know nothing about any hacking or the other stuff. I do know that Katie is under a barrage of people attempting to link her Google account to people she does not know. It would be the least surprising thing in the world if it turns out that one of your thousands of "followers" is setting her up.

I am skeptical about your allegations, but they should be aired in front of the judge. I also have concerns that I want addressed.

I don't think we can get her attention on a holiday, but perhaps we should send an email or something today.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 d: 206.805.3162
w: gordontilden.com



Michael Saltz 

Inbox - Exchange January 18, 2021 at 11:15 AM



Re: 3171-005 RE: Fake "Complaint"

[Details](#)

To: Michael P. Brown, Cc: Lani Levine, Jeffrey Bilanko, Suki Kaplan



You should be aware of the messages sent to our witness



Chloe



Saturday, 14:13

2 unread messages

You really thought I'd let you
get away wuth bering a
witness for fucking saltzy
today I hacked you all via a
very special vpn and
hacking tools that link to
your ip address that's right
if you continue as a witness
we will prove you
responsible even tho your
not you will end been sued
for and face 45 years in jail.
Your choice sweetheart



18:26

Email me back and we can
sort this out show this to
anyone and you will find
yourself in a wooden box in
the ground like you dead
ugly baby




18:27



You accepted the request


And threats made against us.



Chloe @Mandy14144 · 10m

You really think we'd let any of you mess with our queen? What a few hacking attempts a few nasty pms a few threats and yall go fucking crazy yall bullies! #woacbofficial is one of my best friends no way I'm letting you monsters push her any further


4 1 1 1



Chloe @Mandy14144 · 5m

Is that all it took seriously?! Hahaha we hacked your ip address so this will trace back to you but don't worry we have all your details, bank details, social media accounts so if you try and bully Katie any further I will make sure what she sent you comes true

4 1 1 1




Chloe @Mandy14144

@MichaelSaltzEsq I told you I'd win

12:59 PM · 1/18/21 · [Twitter Web App](#)

4 1 1 1




Chloe @Mandy14144

@MichaelSaltzEsq did you like your new dating sites @theemilydbaker did you enjoy what kj sent you in the postv😂😂


1:05 PM · 1/18/21 · [Twitter Web App](#)

4 1 1 1



completely taken over by someone. My account's email address, password, number, etc. have all been replaced! I need help ASAP! My YT is monetized!! I've tried recovery, but it hasn't worked!! @YouTube @Google

4 1 1 1



Chloe @Mandy14144

Replying to @TheEmilyDBaker

Did you get our message today sweetheart you should listen b4 we doxx u too 🤔 no hate but Katie is 2000 x the person you'll ever be

1:00 PM · 1/18/21 · [Twitter Web App](#)

4 1 1 1

Michael Saltz 

Re: 3171-005 RE: Fake "Complaint"

To: Michael P. Brown, Cc: Lani Levine, Jeffrey Bilanko, Suki Kaplan

 Inbox - Exchange January 18, 2021 at 11:32 AM

[Details](#)



Michael:

Then please explain this posting by your client.



On Jan 18, 2021, at 11:17 AM, Michael P. Brown <mbrown@gordontilden.com> wrote:

It's abusive, but it's not from my client. Please stop posting Tweets accusing Katie of these hacks.

Michael P. Brown

Gordon Tilden Thomas & Cordell LLP
One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 d: 206.805.3162
w: gordontilden.com

[<image001.jpg>](#)

Michael Saltz 

Re: 3171-005 RE: Fake "Complaint"

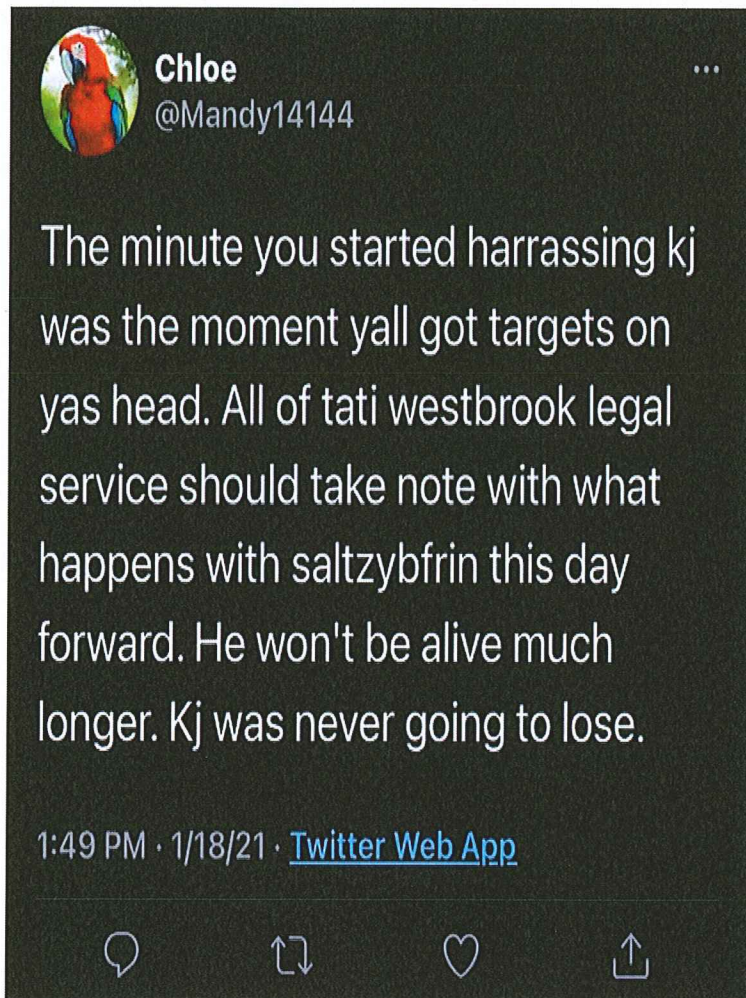
To: Michael P. Brown, Cc: Lani Levine, Jeffrey Bilanko, Suki Kaplan

 Inbox - Exchange January 18, 2021 at 12:06 PM

[Details](#)



Then why are they saying they are doing for your client.



On Jan 18, 2021, at 11:43 AM, Michael P. Brown <mbrown@gordontilden.com> wrote:

This is your evidence in support of publicly accusing Katie of a federal crime like hacking? I look forward to getting a court's or a jury's take on that.

Michael P. Brown

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One Union Square
600 University Street, Suite 2915
Seattle, Washington 98101
t: 206.467.6477 d: 206.805.3162
w: gordontilden.com

EXHIBIT “2”

From: ECF@wawd.uscourts.gov
Sent: Monday, January 18, 2021 5:53 PM
To: ECF@wawd.uscourts.gov
Subject: Activity in Case 2:20-cv-01606-BJR Westbrook et al v. Paulson et al Request

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United States District Court for the Western District of Washington

Notice of Electronic Filing

The following transaction was entered by Brown, Michael on 1/18/2021 at 5:52 PM PST and filed on 1/18/2021

Case Name: Westbrook et al v. Paulson et al

Case Number: 2:20-cv-01606-BJR

Filer: Katie Joy Paulson

Document Number: 39

Docket Text:

REQUEST FOR STATUS CONFERENCE by Defendant Katie Joy Paulson for Status Conference (Brown, Michael)

2:20-cv-01606-BJR Notice has been electronically mailed to:

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